



Carmen  
Santos/R9/USEPA/US  
09/09/2008 11:06 AM

To "David Regonini" <david.r@wt-us.com>  
cc  
bcc  
Subject Re: Washington Park Corporate Center

Greetings, David:

Thank you for sending the proposed contingencies which I have reviewed. At first glance and preliminarily they seem reasonable. I will consult with the EPA toxicologist the issue of the risk-based approach in reference to leaving in place PCB concentrations higher than 10 ppm at a depth of say 40 feet bgs in a residential scenario. I will do my best to get back to you today.

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"David Regonini" <david.r@wt-us.com>



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<david.r@wt-us.com>  
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To Carmen Santos/R9/USEPA/US@EPA  
cc  
Subject Re: Washington Park Corporate Center

We are looking at the contingency issue for the identified contaminated area. In order to drill the borings through the center of the identified contaminated area (as proposed), we need to install the capping/backfill system first. But we do not want to be in a position where we have to remove right away due to results from the borings. Item 1, we propose modifying the boring locations to the perimeter of the identified contaminated area rather than through it so we can drill the borings before installing the capping system. Item 2, If concentrations exceed 10 PPM but not to a significant depth, Contingency 1 will be to undertake a round of excavation and verification testing consistent with the original remediation notice. If it looks like the vertical extent is deeper, then as Contingency 2, we would like to consider applying for a risk-based closure of the identified contaminated area under 761.61(c) as long as that still would allow us to permit residential use.

If this sounds reasonable, I will wrap this up today and send it over to you for your review.

David Regonini  
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